

# Tab 43



Mark Hammervold <mark@hammervoldlaw.com>

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## Beckwith - Rule 408 Communication

14 messages

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Mark Hammervold <mark@hammervoldlaw.com>

Thu, Apr 18, 2019 at 4:56 PM

You offered me [REDACTED] for a buyout of my quantum meruit claim. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Nashville, TN 37238

[REDACTED]

[REDACTED]

[REDACTED]

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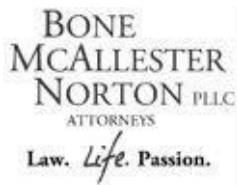
**St**  
**To**

Mon, Apr 29, 2019 at 11:29 AM

Mark,

I will try to resolve this by tomorrow.

Stacey



**Stacey Garrett Koju** | Attorney  
Bone McAllester Norton PLLC  
511 Union Street / Suite 1600 / Nashville, TN 37219  
tel (615) 238-6350 / fax (615) 687-2204  
skoju@bonelaw.com / www.bonelaw.com

**Follow Me:**   

[Quoted text hidden]

Bone McAllester Norton PLLC mail server made the following annotations:

\*\*\*\*\*

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you have received this message in error, you are not authorized to copy, print, distribute, or otherwise use the information. Please contact the sender immediately by return e-mail and delete the original message and all attachments.

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**mark@hammervoldlaw.com** <mark@hammervoldlaw.com>  
To: Stacey Garrett Koju <skoju@bonelaw.com>

Mon, Apr 29, 2019 at 11:35 AM

Thanks.

Sent from my iPhone

On Apr 29, 2019, at 11:29 AM, Stacey Garrett Koju <skoju@bonelaw.com> wrote:

Mark,

I will try to resolve this by tomorrow.

Stacey

**Stacey Garrett Koju** | Attorney  
Bone McAllester Norton PLLC  
<imagebf74b8.JPG> 511 Union Street / Suite 1600 / Nashville, TN 37219  
tel (615) 238-6350 / fax (615) 687-2204  
skoju@bonelaw.com / www.bonelaw.com

**Follow Me:**   <imagedc4ed4.PNG>

[Quoted text hidden]

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**Mark Hammervold** <mark@hammervoldlaw.com>  
To: Stacey Garrett Koju <skoju@bonelaw.com>

Tue, Apr 30, 2019 at 2:51 PM

Stacy,

I just wanted to follow up on this.

Thanks,

Mark Hammervold  
Hammervold PLC

315 Deaderick St., Ste. 1550  
Nashville, TN 37238  
P: 405.509.0372  
Hammervoldlaw.com

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**Stacey Garrett Koju** <skoju@bonelaw.com>  
To: Mark Hammervold <mark@hammervoldlaw.com>

Tue, Apr 30, 2019 at 4:14 PM

Hi Mark,

I will send you an email by tomorrow.

Stacey

[Quoted text hidden]

[Quoted text hidden]

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**Mark Hammervold** <mark@hammervoldlaw.com>  
To: Stacey Garrett Koju <skoju@bonelaw.com>

Wed, May 1, 2019 at 4:43 PM

Stacey,

Just following up on this. Sorry to chase.

Mark Hammervold  
Hammervold PLC  
315 Deaderick St., Ste. 1550  
Nashville, TN 37238  
P: 405.509.0372  
Hammervoldlaw.com

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**Stacey Garrett Koju** <skoju@bonelaw.com>  
To: Mark Hammervold <mark@hammervoldlaw.com>

Thu, May 2, 2019 at 10:46 AM

Mark,

Just a quick note to let you know that I am offsite at a client's board meeting through tomorrow afternoon and not ignoring your email. If I can, I will get something to you tonight, and if I cannot then certainly Friday as soon as the meeting ends.

[Quoted text hidden]

[Quoted text hidden]

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**Mark Hammervold** <mark@hammervoldlaw.com>  
To: Stacey Garrett Koju <skoju@bonelaw.com>

Thu, May 2, 2019 at 10:47 AM

Thanks.

Mark Hammervold

Hammervold PLC  
315 Deaderick St., Ste. 1550  
Nashville, TN 37238  
P: 405.509.0372  
Hammervoldlaw.com

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**Mark Hammervold** <mark@hammervoldlaw.com>  
To: Stacey Garrett Koju <skoju@bonelaw.com>

Mon, May 6, 2019 at 11:00 AM

Stacey,

Hope you had a nice weekend. Just wanted to follow up on this with you. Sorry to chase.

Thanks,

Mark Hammervold  
Hammervold PLC  
315 Deaderick St., Ste. 1550  
Nashville, TN 37238  
P: 405.509.0372  
Hammervoldlaw.com

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**Stacey Garrett Koju** <skoju@bonelaw.com>  
To: "mark@hammervoldlaw.com" <mark@hammervoldlaw.com>

Mon, May 6, 2019 at 12:17 PM

[Quoted text hidden]  
[Quoted text hidden]

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**Mark Hammervold** <mark@hammervoldlaw.com>  
To: Stacey Garrett Koju <skoju@bonelaw.com>

Mon, May 6, 2019 at 12:21 PM

Stacey,

When we last spoke on the phone, you said you were authorized to settle my fee for [REDACTED]

Thanks,

Mark Hammervold  
Hammervold PLC  
315 Deaderick St., Ste. 1550  
Nashville, TN 37238  
P: 405.509.0372  
Hammervoldlaw.com

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**Stacey Garrett Koju** <skoju@bonelaw.com>  
To: Mark Hammervold <mark@hammervoldlaw.com>

Mon, May 6, 2019 at 3:12 PM

Mark,



I will call you as soon as my conference call ends.

Stacey

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**From:** Mark Hammervold [mailto:[mark@hammervoldlaw.com](mailto:mark@hammervoldlaw.com)]

**Sent:** Monday, May 06, 2019 11:00 AM

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

# Tab 44

SUBJECT: Re: LBMC  
FROM: Mark Hammervold <mark@hammervoldlaw.com>  
TO: Stacey Garrett Koju <skoju@bonelaw.com>  
CC: Beckwith Larry <larry@beckwith.enterprises>, "christy@beckwith.enterprises" <christy@beckwith.enterprises>, Sam Jackson <s.jackson@bonelaw.com>  
DATE: 13/05/2019 10:03

[REDACTED]

Thanks,

Mark Hammervold  
Hammervold PLC  
315 Deaderick St., Ste. 1550  
Nashville, TN 37238  
P: 405.509.0372  
[Hammervoldlaw.com](http://hammervoldlaw.com)

On Mon, May 13, 2019 at 9:54 AM Stacey Garrett Koju <skoju@bonelaw.com> wrote:

Mark,

[REDACTED]

Best,  
Stacey

Stacey Garrett Koju | Attorney  
Bone McAllester Norton PLLC  
511 Union Street / Suite 1600 / Nashville, TN 37219  
tel (615) 238-6350 / fax (615) 687-2204  
[skoju@bonelaw.com](mailto:skoju@bonelaw.com) / [www.bonelaw.com](http://www.bonelaw.com)

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**From:** Mark Hammervold [mailto:[mark@hammervoldlaw.com](mailto:mark@hammervoldlaw.com)]  
**Sent:** Monday, May 13, 2019 9:44 AM  
**To:** Stacey Garrett Koju  
**Cc:** Beckwith Larry; christy@beckwith.enterprises; Sam Jackson  
**Subject:** Re: LBMC

[REDACTED]

Thanks,

Mark Hammervold  
Hammervold PLC  
315 Deaderick St., Ste. 1550  
Nashville, TN 37238  
P: 405.509.0372  
[Hammervoldlaw.com](http://hammervoldlaw.com)

On Thu, May 9, 2019 at 12:17 PM Stacey Garrett Koju <skoju@bonelaw.com> wrote:

Mark,

Given our inability to reach an agreement [REDACTED]

Stacey

Sent from my iPhone

[cid:image023e16.JPG@6bf235c2.4082b9e1]<<http://www.bonelaw.com>>

Stacey Garrett Koju | Attorney  
Bone McAllester Norton PLLC  
511 Union Street / Suite 1600 / Nashville, TN 37219  
tel (615) 238-6350 / fax (615) 687-2204  
[skoju@bonelaw.com](mailto:skoju@bonelaw.com)<mailto:[skoju@bonelaw.com](mailto:skoju@bonelaw.com)> / [www.bonelaw.com](http://www.bonelaw.com)<<http://www.bonelaw.com>>

# Tab 59

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

MARK HAMMERVOLD;

Plaintiff

v.

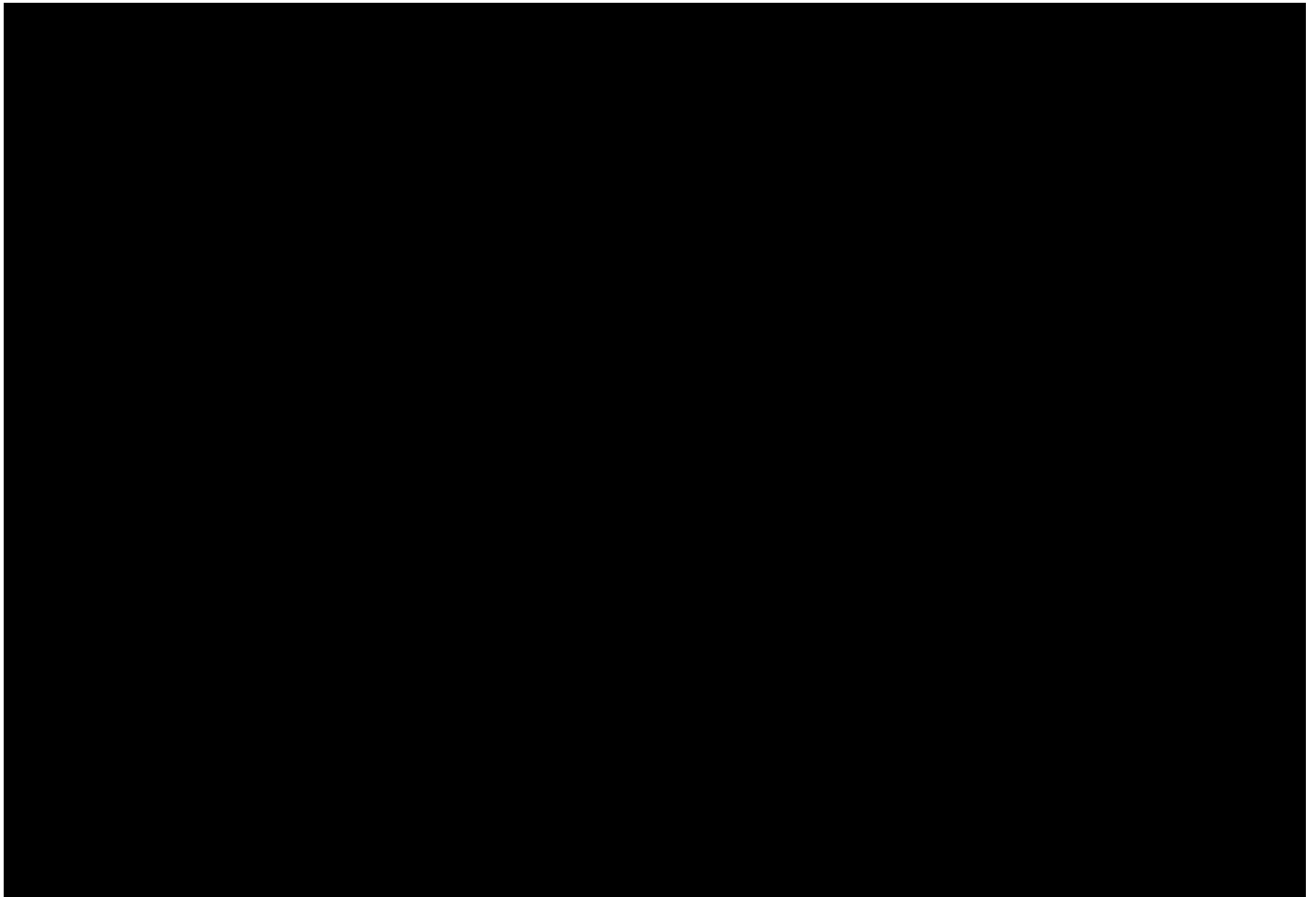
LARRY BECKWITH;

§  
§  
§  
§  
§  
§  
§  
§

No. \_\_\_\_\_

COMPLAINT

The Plaintiff, Mark Hammervold (“Hammervold”), states as follows to the Court and jury  
in support of his causes of action against the Defendants:



# Tab 60

**Cotter, Jamie N.**

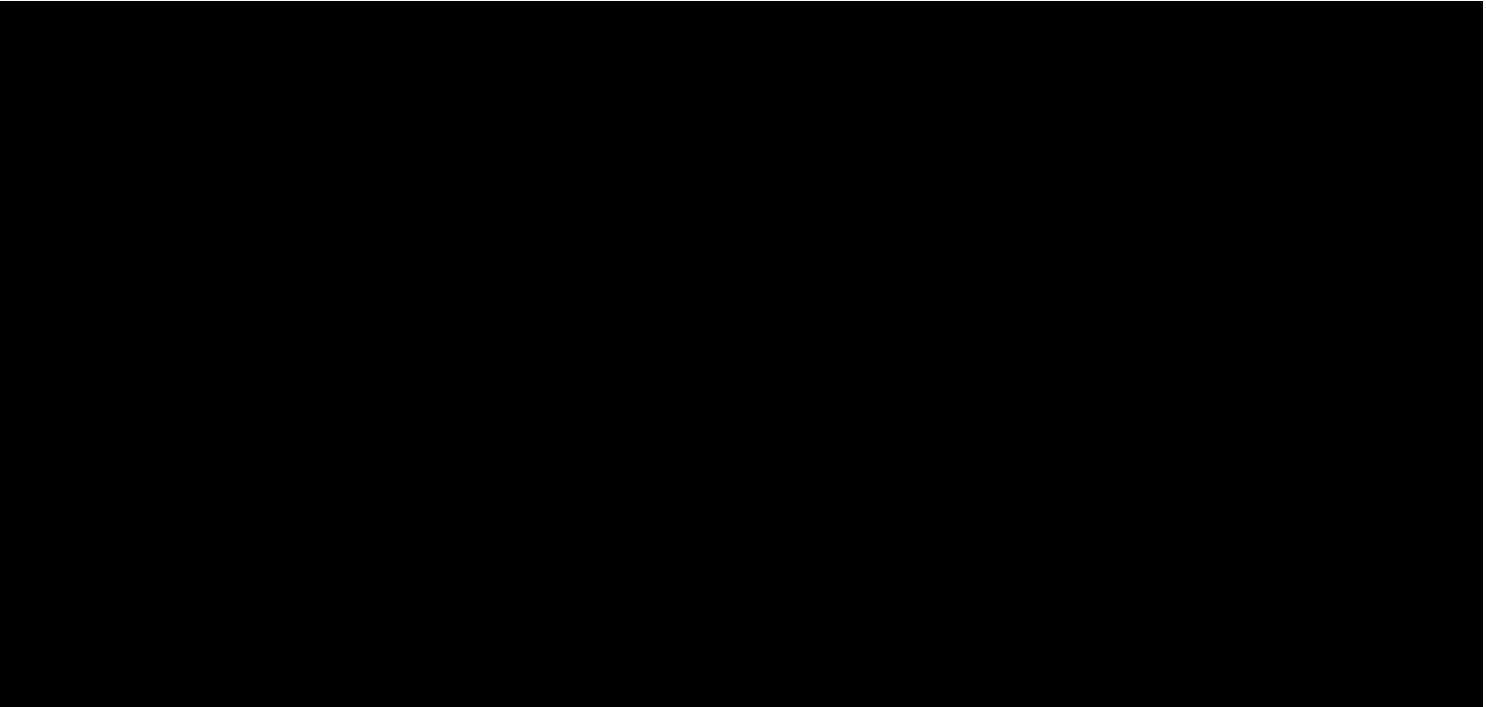
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**From:** Mark Hammervold <mark@hammervoldlaw.com>  
**Sent:** Wednesday, October 5, 2022 12:33 PM  
**To:** Cotter, Jamie N.  
**Cc:** Koju, Stacey  
**Subject:** [EXTERNAL] Re: Hammervold v. Beckwith - Draft Complaint  
**Attachments:** KL Hourly Rate 2020-2022.pdf; Order 3-23-21 (discharging receiver).pdf

[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.

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Jamie and Stacey,



Mark Hammervold  
P: 405.509.0372  
F: 615.928.2264  
[Hammervoldlaw.com](http://Hammervoldlaw.com)



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CRE 408: In your draft complaint, you disclose various confidential, rule 408, settlement communications. Mr. Beckwith does not agree to waive the protections of Rule 408 and cautions you against filing anything disclosing that information.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]







**Jamie N. Cotter** Attorney at Law  
Spencer Fane LLP

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1700 Lincoln Street, Suite 2000 | Denver, CO 80203  
📞 303.839.3826  
[jcotter@spencerfane.com](mailto:jcotter@spencerfane.com) | [spencerfane.com](http://spencerfane.com)

Pronouns: She/Her/Hers

# Tab 61

**Cotter, Jamie N.**

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**From:** Mark Hammervold <mark@hammervoldlaw.com>  
**Sent:** Friday, November 4, 2022 10:05 AM  
**To:** Cotter, Jamie N.; Koju, Stacey  
**Subject:** [EXTERNAL] Hammervold v. Beckwith - Rule 408 Communication  
**Attachments:** Emails re Settlement Offer.pdf; Email chain re MH Quantum Meruit Fee 4-18-19.pdf

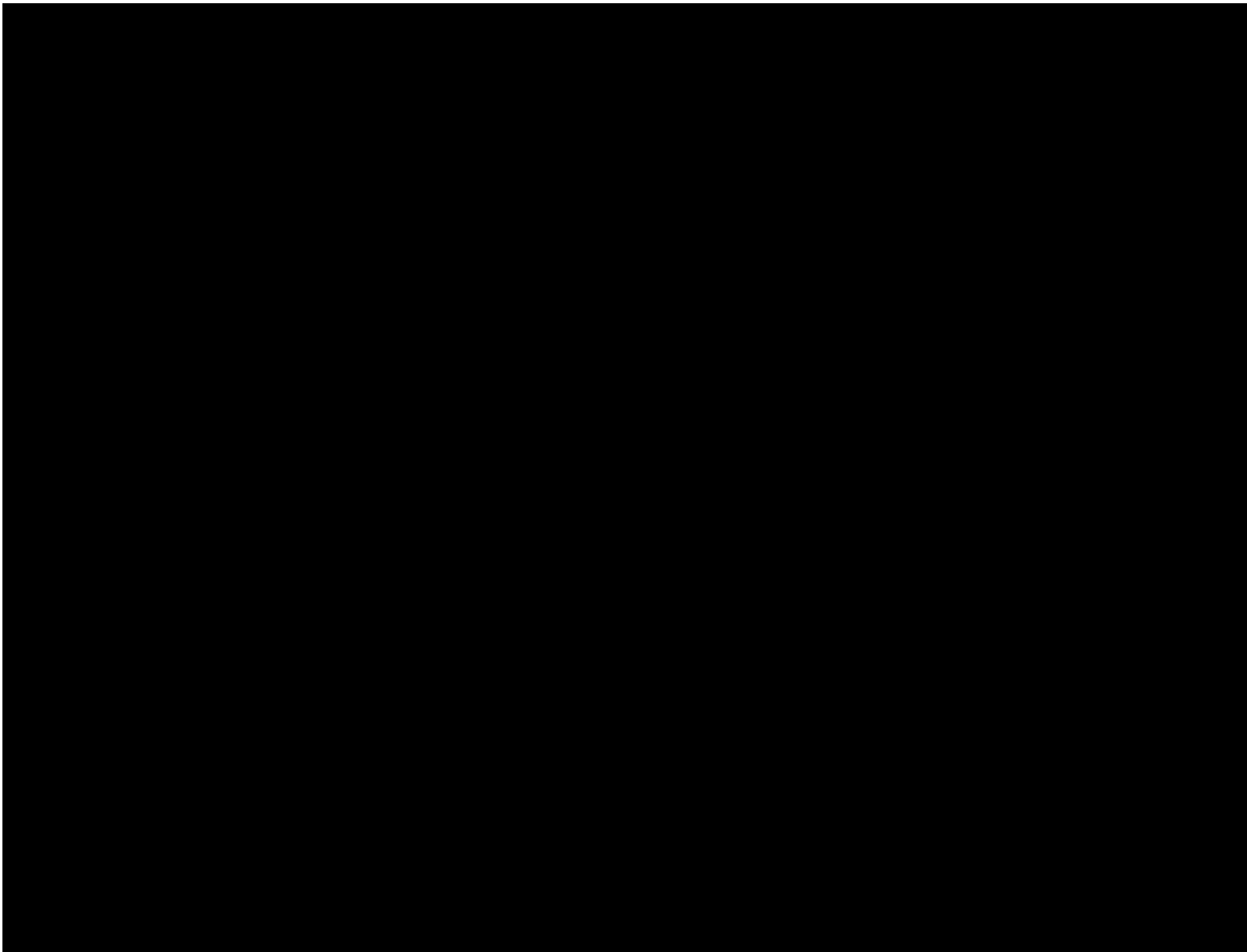
**[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.**

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Jamie,

Thanks for calling me today.

As promised, attached are the two email chains from 2019 where a settlement was previously discussed. But, as I made clear during the call, my settlement posture has significantly changed since 2019.



[REDACTED]

Thanks,

Mark Hammervold  
P: 405.509.0372  
F: 615.928.2264  
[Hammervoldlaw.com](http://Hammervoldlaw.com)